

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SARA WILSON CELONA
Plaintiff

v.

DAVID J. SCOTT, in his official capacity as
Pepperell Chief of Police
Defendant

Civil Action No: 1:15-CV-11759-DJC

DEFENDANT'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT

Defendant, David J. Scott, Chief of Police in the Town of Pepperell, by his counsel, undersigned, submits his opposition to the within motion for summary judgment filed by the Plaintiff, Sara Celona.

Defendant asserts:

1. That he acted in good faith as reviewing authority for the issuance of Licenses to Carry firearms and that the Plaintiff was not denied either administrative or judicial due process; and,
2. That the within case is effectively moot as he will follow the recent guidance dated October 26, 2015, received from the Massachusetts Executive Office for Public Safety and Security and will review the Plaintiff's renewed application for a License to Carry without regard to any allegation of the possession of marijuana in the State of Vermont which had previously been regarded as a disqualification for such License and the subject of this case.

The opposition is filed together with the attached memorandum, statement of material facts and exhibits thereto and other materials in the Court's files.

Dated: December 28, 2015

Respectfully Submitted, by the Town Counsel
for the Town of Pepperell and Attorney for
Defendant David Scott

/s/ Edward J. Richardson
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CERTIFICATE OF SERVICE

Edward J. Richardson, undersigned, hereby certifies that the within was served through the ECF system on December 28, 2015.

/s/ Edward J. Richardson
Edward J. Richardson